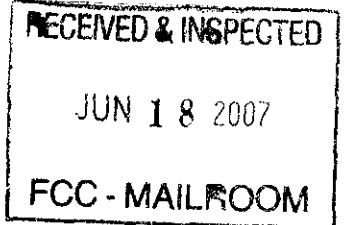


DOCKET FILE COPY ORIGINAL

June 18, 2007



Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: MB Docket No. 07-78/ Christine, Texas
Counterproposal

Dear Ms. Dortch:

Enclosed is an original and four (4) copies of my
Counterproposal for MB Docket No. 07-78, Christine, Texas.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Linda Crawford".

Linda Crawford
3500 Maple Ave., #1320
Dallas, Texas 75219
(214) 289-5333

Christine C

No. of Copies rec'd
List ABCDE

014

RECEIVED & INSPECTED
JUN 18 2007
FCC - MAILROOM

To: Office of the Secretary
Attn: Assistant Chief, Audio Division,
Media Bureau

	<u>Current</u>	<u>Proposed</u>
Christine, TX	-----	245A
Tilden, TX	-----	250A
George West, TX	250A	296A
Beeville, TX	296A	246A

1

population of 436 people.¹ Christine has its own mayor, city council, volunteer fire department, post office, commercial businesses and a number of local churches. Christine is a community that is certainly deserving of a local FM service. The proposed channel 245A will provide additional diversity and an outlet for local self expression to Christine residents and therefore is in the public interest.

Attached hereto is a channel study confirming that Channel 245A can be allocated to Christine, Texas, consistent with the FCC's FM separation rules. See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992). (See, Attachment A) Note: the petition to add Channel 245C3 at Tilden, Texas was dismissed per Report & Order, DA 04-914, released April 5, 2004. That action is pending Application for Review which is, however, no impediment to the consideration of the petition to allot Channel 245A to Christine, Texas, in accordance with the policy set forth in the Memorandum Opinion and Order in MM Docket No. 01-104 (Auburn, Alabama, et al). Also note: there are two counterproposals to add Channel 245C1 at San Antonio, Texas, one involving 00-148/ Quanah, Texas and the other involved 05-112/ Fredericksburg, Texas, both have been denied via Report & Orders. Docket 00-148 was dismissed per Report & Order, DA 03-1533, released May 8, 2003. That action was subsequently upheld per the Commission's Memorandum Opinion and Order, released on April 27, 2004. The Commissions decision in MM Docket 00-148 is effective, although not yet final owing to a pending Application for Review. The Report & Order for Docket 05-112, was released 6/15/07 and denied the requested channel 245C1/ San Antonio. This is an effective but not yet final dismissal per Auburn, Alabama.

Reference coordinates for Channel 245A at Christine, Texas are:

28 46 18 N
98 30 00 W

Tilden, Texas 250A. 1st Service

Counterproponent respectfully submits that the public interest would be served by allocating Channel 250A to Tilden, Texas as that community's first broadcast service. Tilden is the county seat of McMullen County and has a population of 450 people, according to the 2000 Rand

¹ U.S. Census 2000

McNally Commercial Atlas. Tilden has it own post office, volunteer fire department, churches and 40 business establishments that have been given credit ratings by Dun & Bradstreet. The proposed channel 250A will provide additional diversity and an outlet for local self-expression to Tilden residents and therefore is in the public interest.

Attached hereto is a channel study confirming that Channel 250A can be allocated to Tilden, Texas, consistent with the FCC's FM separation rules provided a channel substitution is made for the vacant allotment at George West, Texas. See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992). (See, Attachment B) Note: there are two counterproposals to add channel 245C1 to San Antonio, one contained in 00-148/ Quanah and the other contained in 05-112/ Fredericksburg. Both of these counterproposals were denied via Report & Orders and although not final they are effective dismissals, via Auburn, Alabama. The counterproposal contained in Docket 00-148 was dismissed per Report & Order, DA 03-1533, released May 8, 2003. And, the counterproposal to add channel 245C1/ San Antonio in Docket 05-112 was denied per Report & Order, DA 07-2544, released June 15, 2007.

Reference coordinates for Channel 250A at Tilden, Texas are:

28 25 48 N
98 31 24 W

250A/ George West, Texas

In order for channel 250A to be allotted at Tilden, Channel 296A must be substituted for channel 250A, the vacant allotment at George West, Texas.

Attached is a channel study confirming that channel 296A can be substituted for channel 250A, consistent with the FCC's FM separation rules, providing a substitution is made for station KRXB at Beeville, Texas. (See, Attachment C)

Reference coordinates for Channel 296A at George West, Texas are:

28 24 24 N
98 06 00 W

KRXB 296A/ Beeville, Texas

In order for channel 296A to be allotted at George West, channel 246A must be substituted for station KRXB, channel 296A at Beeville, Texas, licensed to Shaffer

Communications Group, Inc. Counterproponent request the Commission to issue an order to show cause why the license of station KRXB at Beeville, Texas should not be modified to specify operation on channel 246A. Channel 246A can be allotted to Beeville, Texas at the current transmitter site of station KRXB in compliance with the Commission's spacing requirements. Should the Commission decide to substitute channel 246A for 296A at Beeville, Texas, Counterproponent will reimburse the licensee of station KRXB for the reasonable costs involved in changing its channel.

Attached hereto is a channel study confirming that channel 246A can be substituted for channel 296A, station KRXB at Beeville, Texas, at its current transmitter site consistent with the FCC's FM separation rules. (See, Attachment D) Note: the petition to add channel 245C3 at Tilden was denied per Report & Order, DA 04-914, released April 5, 2004.

The reference coordinates for channel 246A at Beeville, Texas are:

28 25 40 N

97 45 36 W

Instant petition filed prior to the adoption of Revision of Procedures Governing Amendments to FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services.

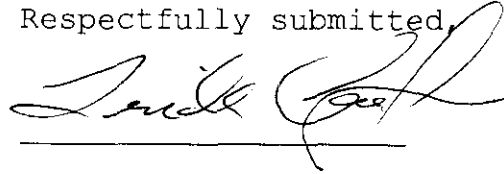
As was noted in the NPRM for this proceeding, MB Docket No. 07-78, Christine, Texas, this instant petition was filed prior to the adoption of the rule changes contained in MB Docket No. 05-210. As such, the petitioner was not required to file a simultaneous Form 301 and submit the appropriate application filing fee for this proceeding. Therefore, if the petitioner is exempt from the filing of a simultaneous Form 301 and submission of the application filing fee, so to should the counterproponent. Consequently, acting under the old rules, the counterproponent is not and does not think she is required to file a Form 301 and submit the application filing fees.

Should this counterproposal be granted and Channel 245A at Christine, Texas and channel 250A at Tilden, Texas are allotted, counterproponent will apply for these channels and after they are authorized, will promptly construct the new facilities. Furthermore, should the Commission authorize these Channels for auction at some future date and eventually proceed to auction, I hereby

certify that it is my full intention to apply to participate in that auction for these channels.

The factual information provided in this counterproposal is correct and true to the best of my knowledge.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Linda Crawford", written over a horizontal line.

Linda Crawford
3500 Maple Ave., #1320
Dallas, Texas 75210
(214) 289-5333

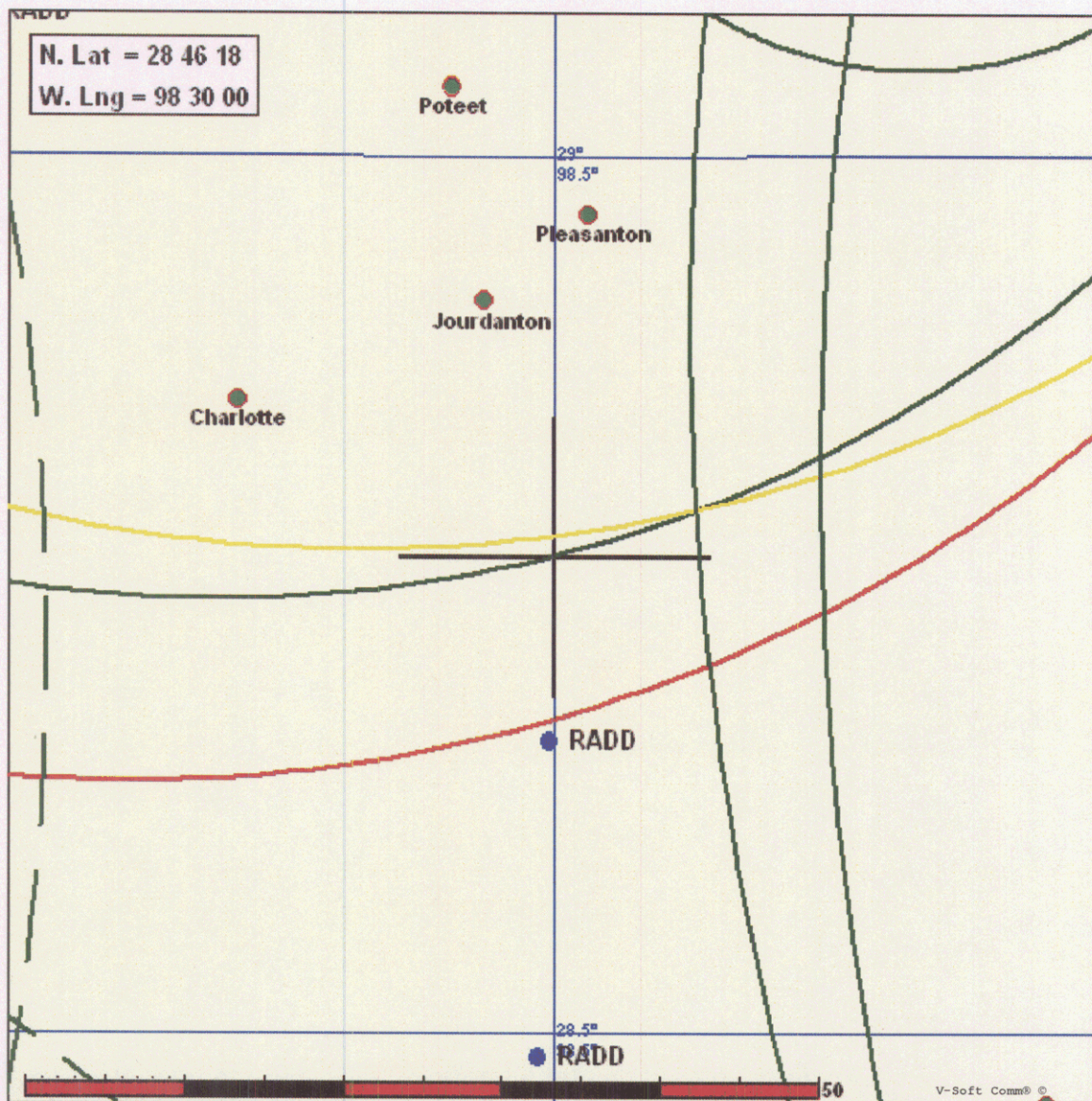
June 18, 2007

Attachment A

(Channel study for channel 245A at Christine, Texas)

CH 245 A, AA, 96.9 MHz

Kzia, Inc.



Data Date:06-12-07 Job Date:06-16-07

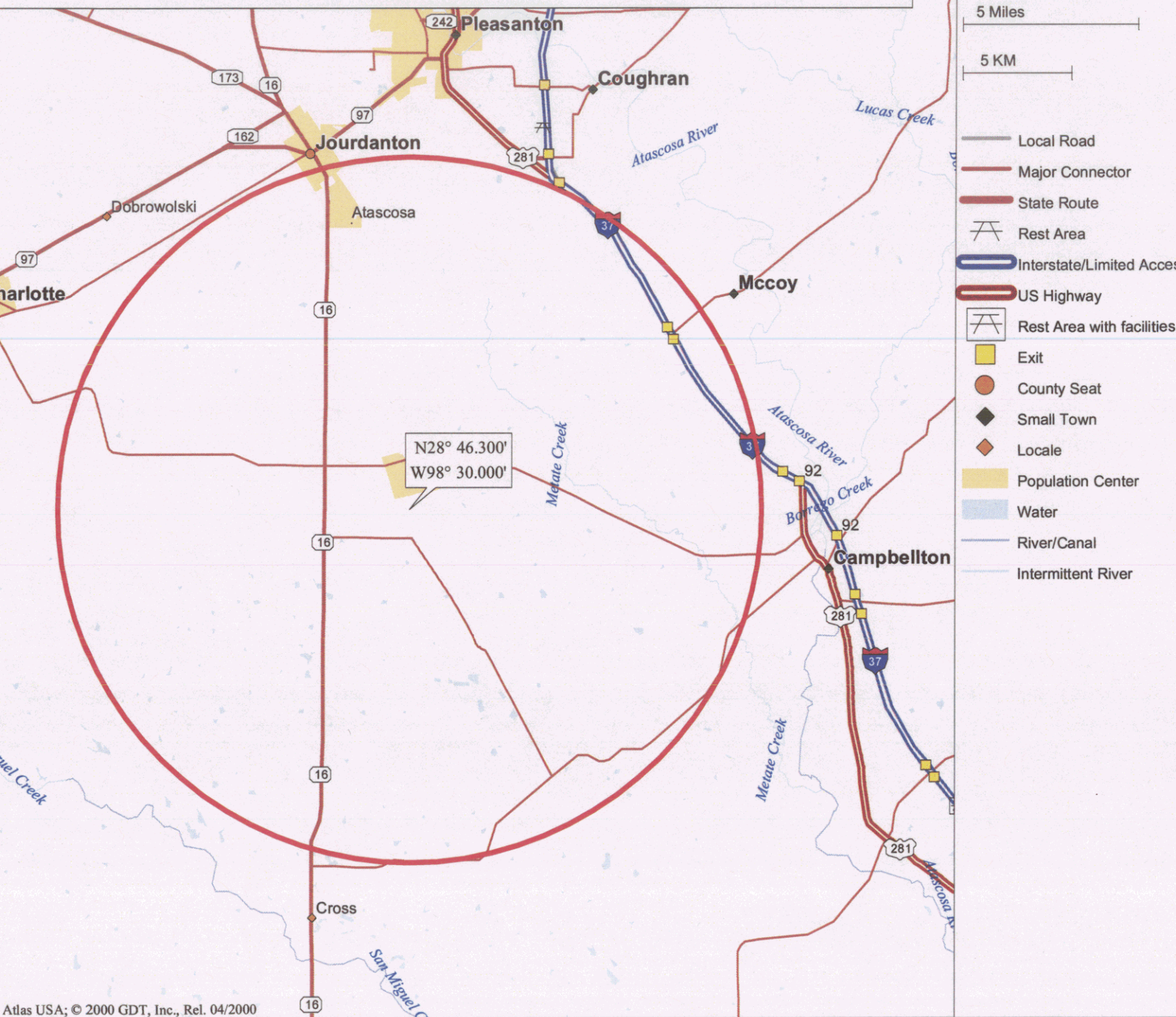
Call	CH#	Type	Location		Azi	D-KM	FCC	Margin
RADD	245C3	ADD	Christine	TX	182.0	11.64	142.0	-130.36
RADD	245C1	ADD	San Antonio	TX	341.6	85.16	200.0	-114.84
RADD	245C1	ADD	San Antonio	TX	341.6	85.16	200.0	-114.84
RADD	245C3	ADD	Tilden	TX	182.0	31.57	142.0	-110.43
RDEL	247C	DEL	San Antonio	TX	341.6	85.16	95.0	-9.84
KAJA	247C0	LIC	San Antonio	TX	345.5	86.13	86.0	0.13
RDEL	247C	DEL	San Antonio	TX	352.5	96.34	95.0	1.34
KIOX-FM	245C1	LIC	El Campo	TX	85.9	209.13	200.0	9.13
KIOX-FM.C	245C0	CP	El Campo	TX	88.6	231.86	215.0	16.86
AL8831	244C	AL	Piedras Negras	CI	268.4	197.13	165.0	32.13
KXTN-FM	298C0	LIC	San Antonio	TX	22.2	60.29	25.0	35.29
XHNLOFM	246B		Nuevo Laredo	TA	219.7	169.16	125.0	44.16
AU7049612	242A	VAC	Cotulla	TX	247.2	75.65	31.0	44.65
AP9947	242A	APP	Cotulla	TX	247.2	75.65	31.0	44.65
RS4261	242C3	RSV	Cotulla	TX	238.7	88.85	42.0	46.85
AP3178	242C3	APP	Cotulla	TX	238.7	88.85	42.0	46.85
XHNLOFM	246B	OPE	Nuevo Laredo	TA	214.8	173.12	125.0	48.12

Christine, TX CH 245A 70 dBu

Mag 11.00
Sat Jun 16 10:40 2007
Scale 1:250,000 (at center)

5 Miles

5 KM

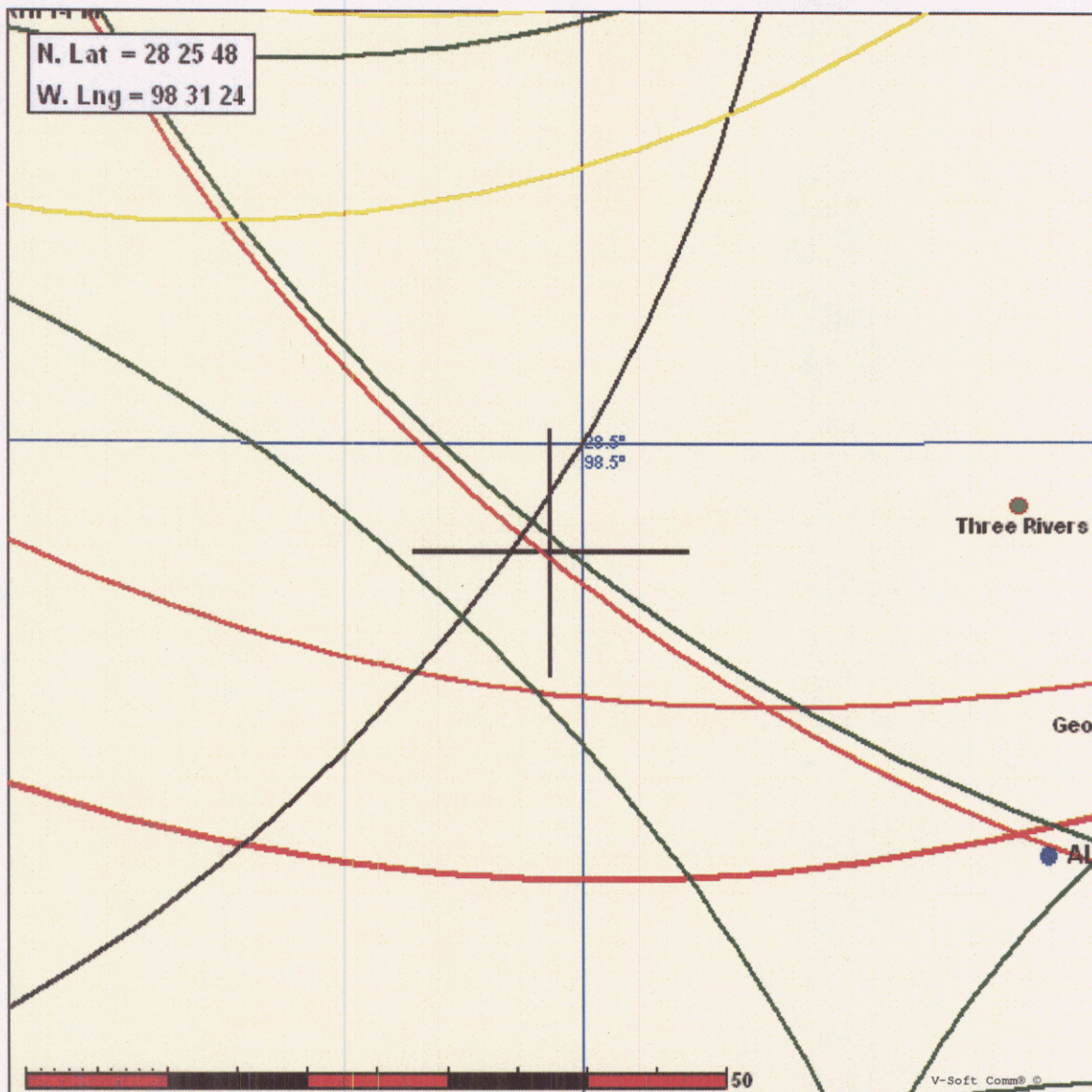


Attachment B

(Channel study for channel 250A at Tilden, Texas)

CH 250 A, AA, 97.9 MHz

Kzia, Inc.

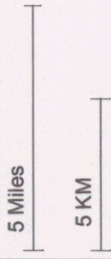


Data Date:06-12-07 Job Date:06-16-07

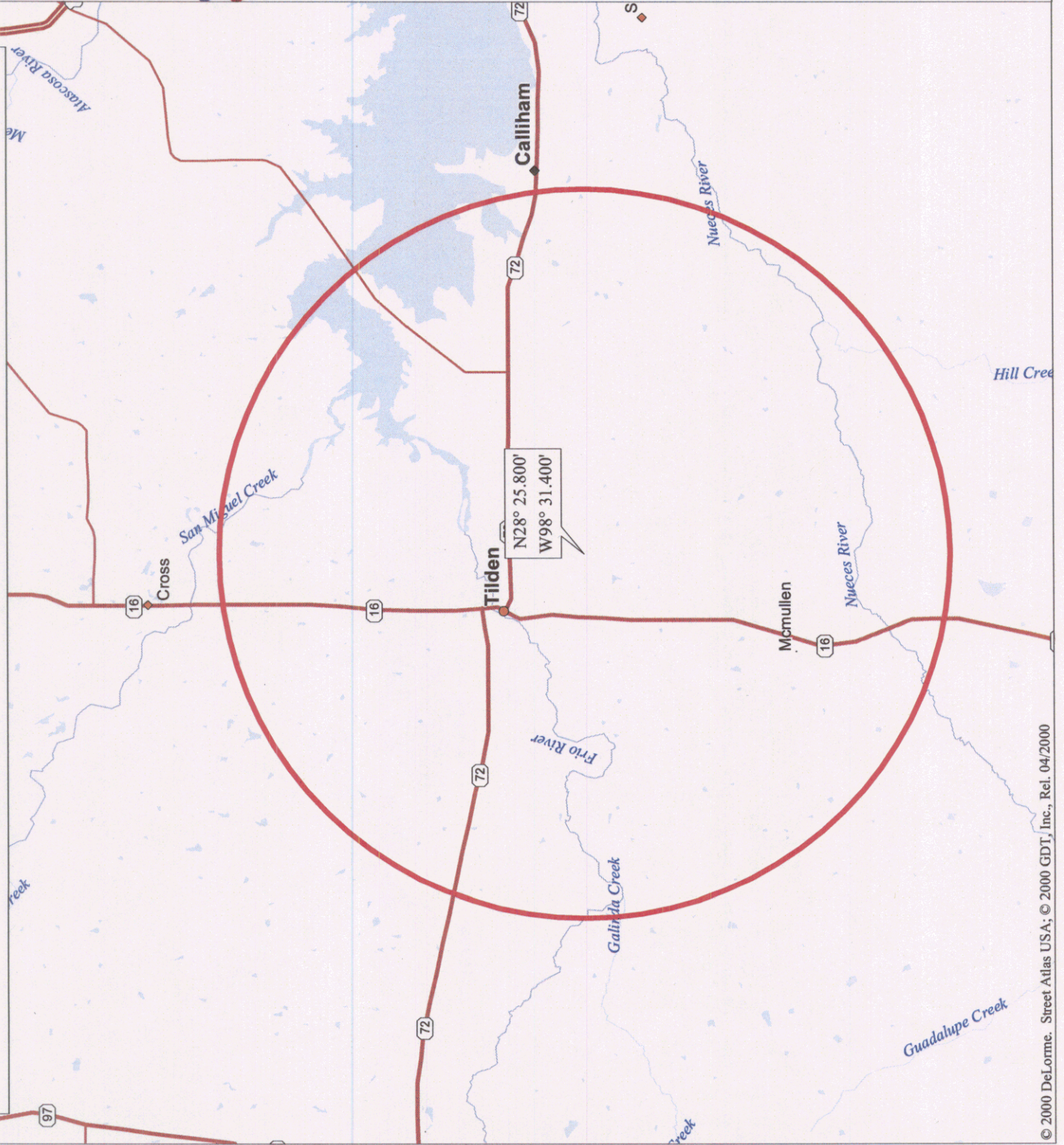
Call	CH#	Type	Location		Azi	D-KM	FCC	Margin
AL0554	250A	VAC	George West	TX	121.4	41.49	115.0	-73.51
RADD	249C1	ADD	Converse	TX	2.0	109.63	133.0	-23.37
RADD	249C1	ADD	Converse	TX	2.0	109.63	133.0	-23.37
RDEL	249C1	DEL	Mcqueeney	TX	2.0	109.63	133.0	-23.37
RADD	249C1	ADD	Converse	TX	2.0	109.63	133.0	-23.37
RDEL	249C1	DEL	Mcqueeney	TX	7.7	122.97	133.0	-10.03
AL6127	249C1	RSV	Mcqueeney	TX	38.9	132.60	133.0	-0.40
KLTO-FM.C	249C1	CP	Mcqueeney	TX	38.5	133.79	133.0	0.79
RADD	250A	ADD	Batesville	TX	304.6	117.37	115.0	2.37
KRRG	251C1	LIC	Laredo	TX	224.4	140.74	133.0	7.74
RDEL	247C	DEL	San Antonio	TX	348.3	121.19	95.0	26.19
KAJA	247C0	LIC	San Antonio	TX	350.9	122.76	86.0	36.76
RDEL	247C	DEL	San Antonio	TX	355.6	133.77	95.0	38.77
KFTX	248C1	LIC-D	Kingsville	TX	130.1	118.42	75.0	43.42
AL8132	250A	VAC	Encino	TX	163.6	159.41	115.0	44.41
KBBT	253C1	LIC	Schertz	TX	350.9	122.76	75.0	47.76
KLTO-FM	249C3	LIC-Z	Cuero	TX	59.9	144.31	89.0	55.31

Tilden, TX CH 250A 70 dBu

Mag 11.00
Sat Jun 16 11:01 2007
Scale 1:250,000 (at center)



- Major Connector
- State Route
- Interstate/Limited Access
- US Highway
- County Seat
- Small Town
- Locale
- Land
- Water
- River/Canal
- Intermittent River

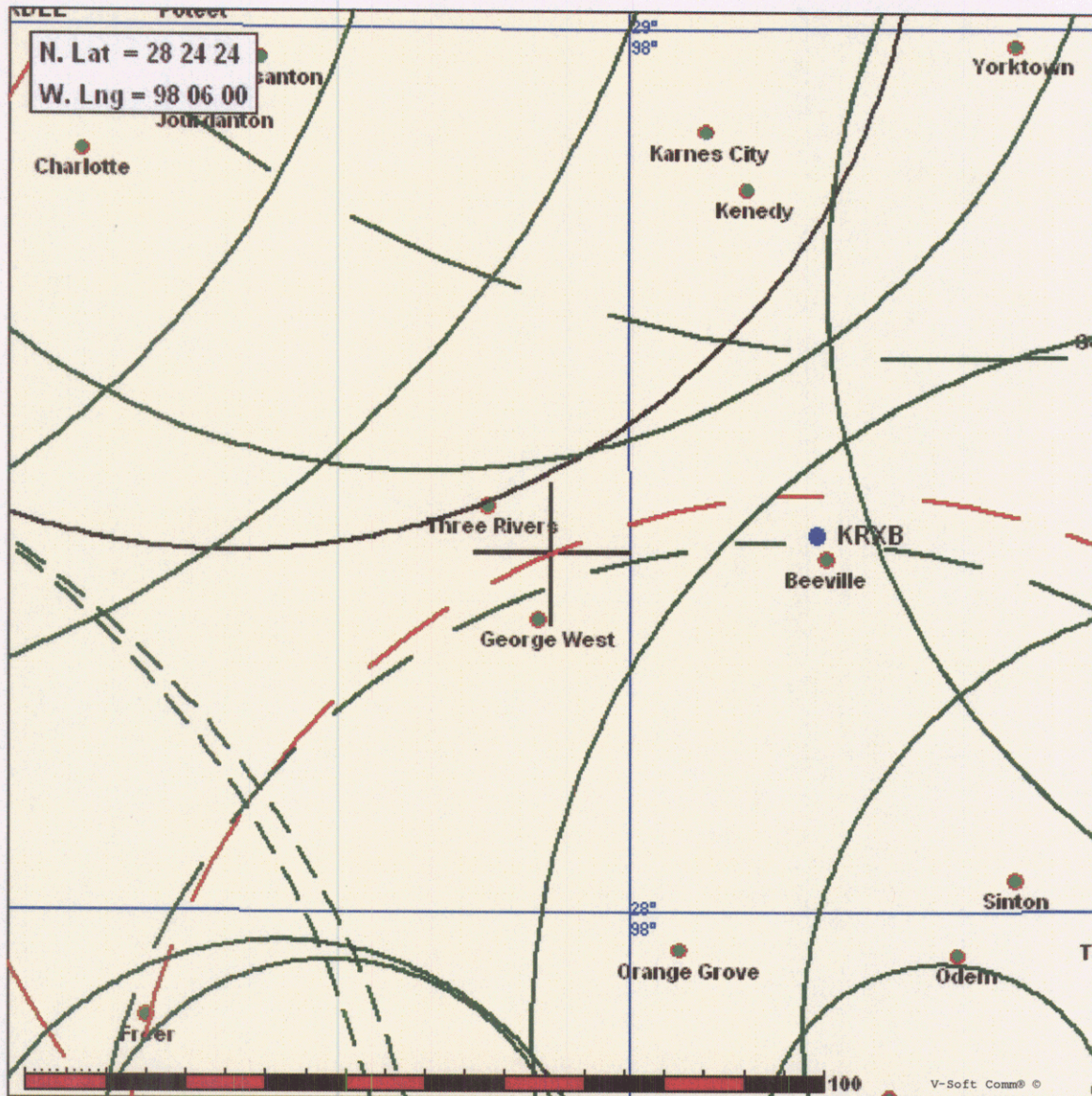


Attachment C

(Channel study for channel 296A at George West, Texas)

CH 296 A, AA, 107.1 MHz

Kzia, Inc.



Data Date:06-12-07 Job Date:06-16-07

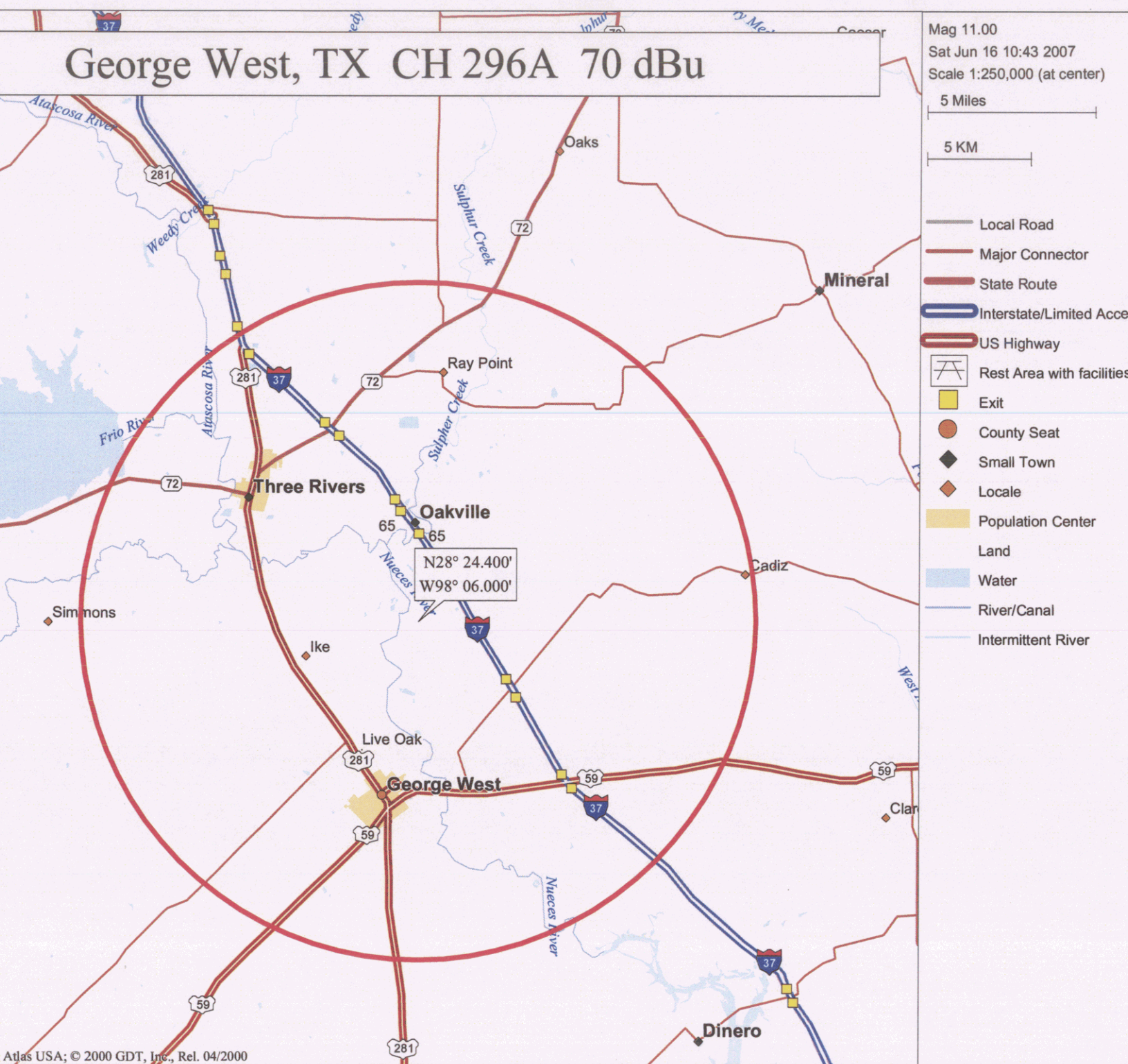
Call	CH#	Type	Location		Azi	D-KM	FCC	Margin
KRXB	296A	LIC N	Beeville	TX	85.9	33.39	115.0	-81.61
KMZZ	295C3	LIC-Z	Bishop	TX	156.4	88.94	89.0	-0.06
KMZZ.A	295C3	APP N	Bishop	TX	160.6	92.80	89.0	3.80
KPWT	294C0	LIC	Terrell Hills	TX	335.1	95.16	86.0	9.16
RADD	294C0	ADD	Terrell Hills	TX	335.1	95.16	86.0	9.16
KXTN-FM	298C0	LIC	San Antonio	TX	350.6	97.53	86.0	11.53
KJKE	297C3	LIC	Ingleside	TX	124.6	105.21	89.0	16.21
RS4257	296C3	RSV	Sabinal	TX	313.9	170.03	142.0	28.03
AP3184	296C3	APP	Sabinal	TX	313.9	170.03	142.0	28.03
KGSR	296C2	LIC N	Bastrop	TX	14.7	196.70	166.0	30.70
KLUB.C	295C3	CP	Bloomington	TX	74.6	128.17	89.0	39.17
KLUB	295C3	LIC N	Bloomington	TX	74.6	128.17	89.0	39.17
XHGTSFM	297B	OPE	Nuevo Laredo	TA	233.9	171.97	125.0	46.97
XHGTSFM	297B		Nuevo Laredo	TA	235.7	174.46	125.0	49.46
KTKY.C	293C2	CP	Taft	TX	124.6	105.23	55.0	50.23
KXTM	299C3	LIC	Benavides	TX	200.6	96.89	42.0	54.89
AU7057093	296A	VAC	Sabinal	TX	307.9	169.90	115.0	54.90

George West, TX CH 296A 70 dBu

Mag 11.00
Sat Jun 16 10:43 2007
Scale 1:250,000 (at center)

5 Miles
5 KM

- Local Road
- Major Connector
- State Route
- Interstate/Limited Access Highway
- US Highway
- Rest Area with facilities
- Exit
- County Seat
- Small Town
- Locale
- Population Center
- Land
- Water
- River/Canal
- Intermittent River

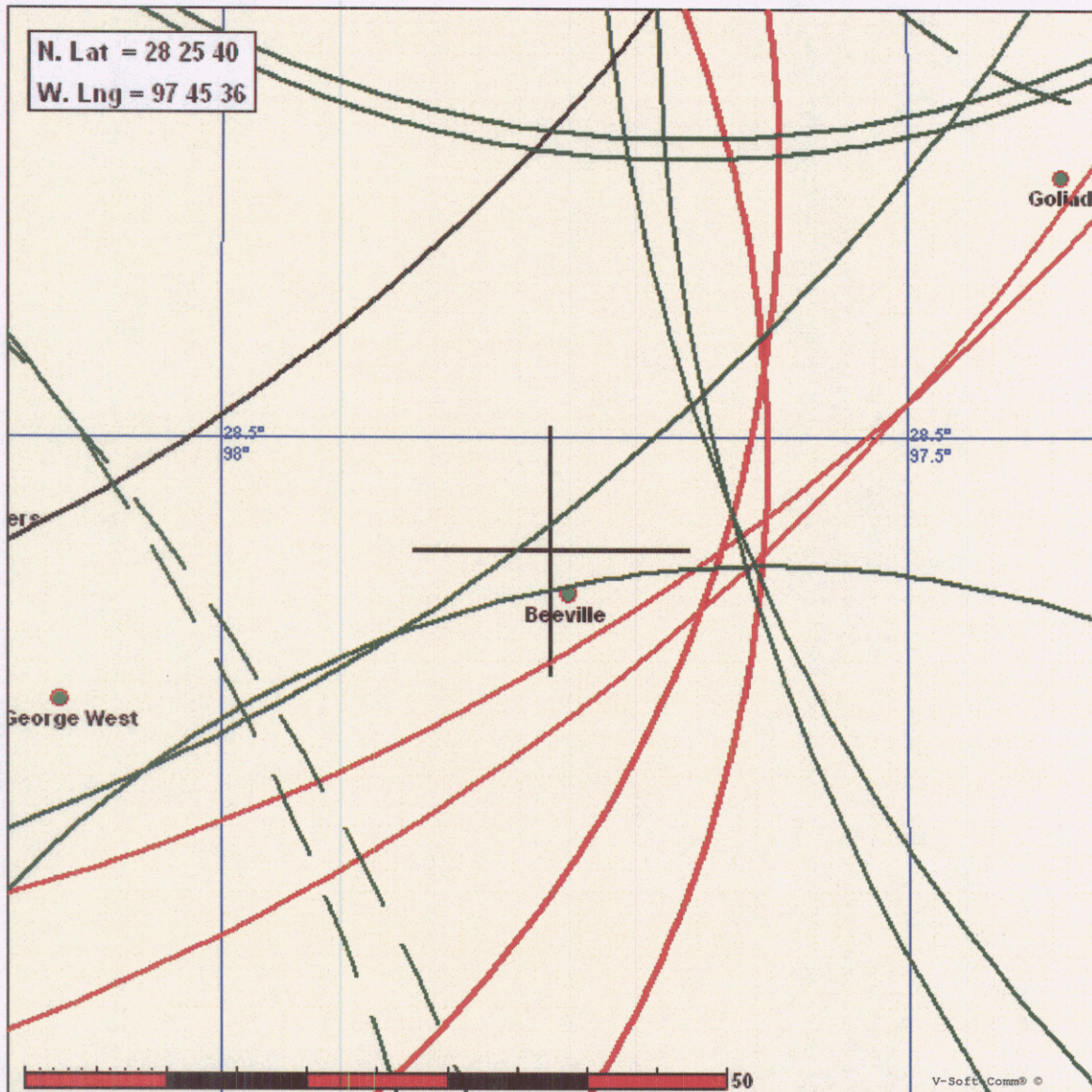


Attachment D

(Channel study for channel 246A at Beeville, Texas)

CH 246 A, AA, 97.1 MHz

Kzia, Inc.



Data Date:06-12-07 Job Date:06-17-07

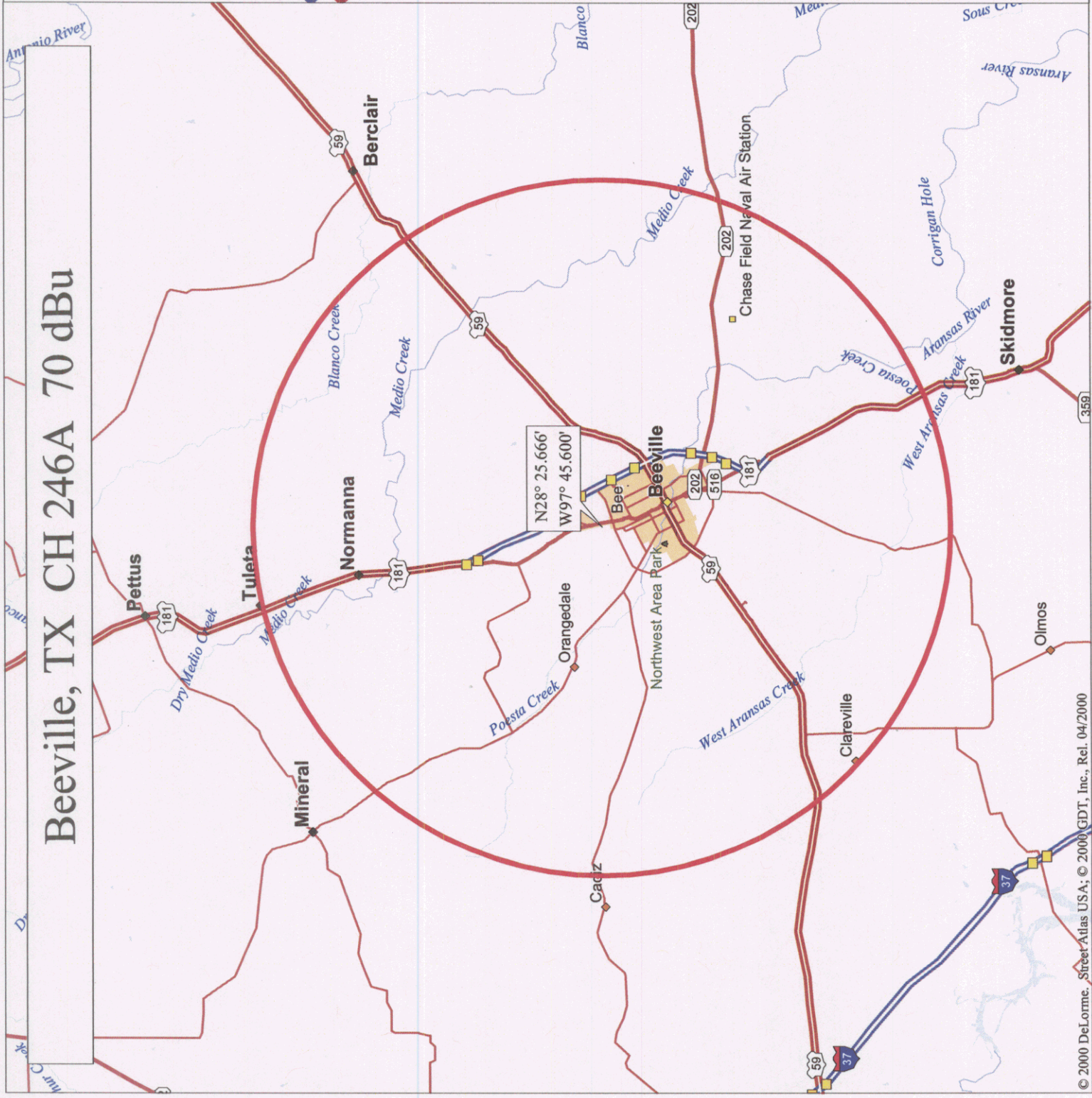
Call	CH#	Type	Location		Azi	D-KM	FCC	Margin
RADD	245C3	ADD	Tilden	TX	275.3	73.88	89.0	-15.12
RADD	245C3	ADD	Christine	TX	290.3	77.48	89.0	-11.52
RDEL	247C	DEL	San Antonio	TX	320.5	154.84	165.0	-10.16
RDEL	247C	DEL	San Antonio	TX	327.9	158.25	165.0	-6.75
KAJA	247C0	LIC	San Antonio	TX	322.7	153.52	152.0	1.52
KLTX	243C1	LIC-D	Corpus Christi	TX	168.5	77.65	75.0	2.65
KFTX	248C1	LIC-D	Kingsville	TX	168.5	77.65	75.0	2.65
KIOX-FM	245C1	LIC	El Campo	TX	69.1	145.98	133.0	12.98
KIOX-FM.C	245C0	CP	El Campo	TX	75.0	165.10	152.0	13.10
RADD	245C1	ADD	San Antonio	TX	320.5	154.84	133.0	21.84
RADD	245C1	ADD	San Antonio	TX	320.5	154.84	133.0	21.84
XHNLOFM	246B	OPE	Nuevo Laredo	TA	239.0	200.62	178.0	22.62
XHNLOFM	246B		Nuevo Laredo	TA	243.2	202.84	178.0	24.84
AL6127	249C1	RSV	Mcqueeney	TX	5.2	103.37	75.0	28.37
KLTO-FM.C	249C1	CP	Mcqueeney	TX	5.2	104.83	75.0	29.83
KLTO-FM	249C3	LIC-Z	Cuero	TX	35.2	87.82	42.0	45.82
RADD	249C1	ADD	Converse	TX	327.6	130.54	75.0	55.54

Mag 11.00
 Sun Jun 17 15:08 2007
 Scale 1:250,000 (at center)

5 Miles
 5 KM

- Local Road
- Major Connector
- State Route
- Interstate/Limited Access
- US Highway
- Exit
- Point of Interest
- Small Town
- Park/Reservation
- Locale
- City
- Population Center
- Land
- Water
- River/Canal
- Intermittent River

Beeville, TX CH 246A 70 dBu



CERTIFICATE OF SERVICE

I, Linda Crawford, hereby certify that on this 18th day of June, 2007, I caused copies of the foregoing "Counterproposal" to be placed in the U.S. Postal Service, first class postage prepaid, addressed to the following persons:

Katherine Pyeatt
2215 Cedar Springs Rd., #804
Dallas, Texas 75201
(214) 991-9363

Gene A. Bechtel, Esq.
Law Office of Gene Bechtel
1050 17th St., N.W., Suite 600
Washington, D.C. 20036

Station KRXB
Shaffer Communications Group, Inc.
1239 B. West 19th Street
Houston, TX 77008


Linda Crawford